

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

WONDERLAND CO., LTD.,	NURSERYGOODS)	Civil Action
)	
)	No. 2:13-cv-00387
Plaintiff,)	
)	Judge Mark R. Hornak
v.)	
)	
THORLEY INDUSTRIES LLC (d/b/a 4MOMS),)	<u>Electronically Filed</u>
)	
Defendant.)	

DECLARATION OF DANIEL F. CUFFARO

I, Daniel F. Cuffaro, hereby declare as follows:

1. I am an industrial designer practicing in the areas of consumer, commercial and medical products, and the chair of the Industrial Design program at the Cleveland Institute of Art (“CIA”), a professional college of art and design. As an industrial designer, I am experienced in research, ideation, design for manufacturing, working with multidisciplinary teams and navigating intellectual property issues.

2. I have authored two expert reports in connection with this case. Attached as Exhibit A to this Declaration is a true and correct copy of a report dated June 16, 2014 that relates to the issue of whether claims 8, 9, and 14 of U.S. Patent No. RE43,919 are valid. Attached as Exhibit B to this Declaration is a true and correct copy of a report dated July 31, 2014 that relates to the issue of whether the Thorley breeze^(R) playard infringes U.S. Patent No. RE43,919.

3. I hereby adopt as my testimony in this case the statements that are contained in these two reports.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 2, 2014.



Daniel F. Cuffaro